

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: PORK ANTITRUST LITIGATION

Case No. 0:18-cv-01776-JRT-JFD

This Document Relates To:

ALL COMMERCIAL AND
INSTITUTIONAL INDIRECT
PURCHASER PLAINTIFFS ACTIONS

**SECOND DECLARATION OF
WILLIAM D. THOMSON IN
SUPPORT OF MOTION TO
EXCLUDE THE TESTIMONY
OF DR. MICHAEL WILLIAMS**

I, William D. Thomson, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm of Stinson LLP and am a member in good standing of the bars of the State of Minnesota and the District of Minnesota. I am one of the attorneys representing Defendant Seaboard Foods LLC in this matter. I am familiar with the matters that follow, and I make this declaration based on my own knowledge.

2. Attached to my declaration as exhibits are true and correct copies of the following documents:

Exhibit 1: Cited excerpts from the transcript of the December 29, 2022, deposition of Dr. Michael Williams (filed under seal).

Exhibit 2: True and correct copies (converted to PDF) of tabs “2005,” “2005Med-Vacc,” “2006,” “2006Med-Vacc,” “2007,” “2007Med-Vacc,” “2008,” and “2008Med-Vacc” from a file entitled “Production Changes Gantt Chart.xlsx,” produced at SBF1119144, and a related Certificate of Authenticity, produced at SBF1120478.

Exhibit 3: True and correct copies (converted to PDF) of tabs “Definitions,” “Nursery-Yearly,” “Nursery-Monthly,” “Finisher-Yearly,” and “Finisher-Monthly” from a file entitled “SBFSD0009(Hog Production Report).xlsx” produced at SBFSD0009.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2023.

/s/ William D. Thomson
William D. Thomson